

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY; AARON WOLKIND;
STEVE HARTLEY; RICHARD SCHWETZ;
JOBEL BARBOSA; MATTHEW
REIDINGER; JOHN HUGO; SEAN-
MICHAEL DAVID SCOTT; THOMAS
LOUDEN; ZACHARY REHL; AMANDA
REHL; K.R., a minor, by and through her
father ZACHARY REHL and her mother
AMANDA REHL, MARK ANTHONY
TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO, et al.,

Defendants.

CIVIL ACTION NO.: 2:20-cv-12880-JMV-JSA

**NOTICE OF MOTION TO EXTEND TIME
TO ANSWER, MOVE, OR OTHERWISE
REPLY TO DEFENDANT COHEN,
WEISS, AND SIMON, LLP'S RULE 11
MOTION PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 6(b)(1)(B)**

TO: CLERK OF THE COURT
Martin Luther King Jr. Federal Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Michael Canning
Giordano, Halleran & Ciesla, P.C.
125 Half Mile Road, Suite 300
Red Bank, New Jersey 07701

PLEASE TAKE NOTICE that on January 18, 2022, or as soon as counsel may be heard, the undersigned attorney for Plaintiff Daniel D'Ambly, (hereinafter "Plaintiff") shall apply to the United States District Court for the District of New Jersey pursuant to Federal Rule of Civil Procedure 6(b)(1)(B) for an order extending time to answer, move, or otherwise reply to defendant Cohen, Weiss and Simon, LLP's Rule 11 Motion. The Plaintiff will rely on the Declaration of Patrick Trainor, Esq., being filed simultaneously with this notice of motion.

A proposed form of order is attached.

Dated: December 26, 2021



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